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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
SOUTHERN DIVISION

LAURA HANSON,

Plaintiff,

v.

STATE OF OREGON LEGISLATIVE
ASSEMBLY,

Defendant.

Case No. 3:21-cv-00780-SI

DEFENDANT'S EXHIBIT LIST

Defendant Oregon Legislative Assembly submits the following list of exhibits for use in the trial of this action. Numbering reflects the number used in depositions reference, and so is non-consecutive. Defendant reserves the right to submit exhibits in rebuttal as permitted under the Rules.

<u>EX. NO.</u>	<u>EXHIBIT DESCRIPTION</u>	<u>OFFERED</u>	<u>RECEIVED</u>
203	[Hansen MSJ Dec. X3] ADA Accommodation form		
204	Hanson BAARS-IV” Self-Report: Current Symptoms		
206	Nov. 12, 2019 Gelser Blouin-Hanson texts		

<u>EX. NO.</u>	<u>EXHIBIT DESCRIPTION</u>	<u>OFFERED</u>	<u>RECEIVED</u>
207	Jan. 21, 2019-Jan. 5, 2020 Gelser Blouin-Hanson texts		
208	Gelser Blouin-Hanson texts incl “toxic environment”		
209	Sept. 30, 2019 “Sick this morning” e-mail string		
210	Dec. 18-29, 2019 Gelser Blouin-Hanson texts		
211	Dec. 19, 2019 Mental Health Day text		
212	Hanson record of leave taken 2 nd half 2019		
213	Hanson diagnosis certification		
214	Dec. 31, 2019 Gelser Blouin e-mail re Hanson concerns		
215	Dec. 31, 2019 Hanson to Knieling e-mail		
216	House Concurrent Resolution 20 amending LBPR 27		
217	House Concurrent Resolution 221 further amending LBPR 27		
218	Dec. 31, 2019-Jan. 2, 2021 Hanson-Knieling e-mail string		
219	Jan 6, 2020 Knieling to Hanson re administrative leave		
220	Jan 5, 2020 Hanson e-mail to Knieling re “Confused about process”		
221	Jan. 14-15, 2020 e-mail string Hanson-Gelser		
222	Feb. 7-12, 2020 text string Hanson-Vanderhart		
223	Jan. 29, 2020 Sandmeyer to Hanson e-mail		
224	July 14, 2020 Nordlund to Holley e-mail re hearing		
225	Oct. 7, 2020 Gelser Blouin to Hanson removal from service memo		
228	Nov. 6, 2020 Secretary of State filing		
229	Hanson pay record		

<u>EX. NO.</u>	<u>EXHIBIT DESCRIPTION</u>	<u>OFFERED</u>	<u>RECEIVED</u>
230	Job hunt materials		
231	Dec. 16, 2020 Employment Dept. job offer		
232	Dec. 17, 2020 revised Employment Department job offer		
233	June 24, 2021 Employment Department job extension		
234	Merry Christmas Sarah Holiday note		
235	Position Description LA-1		
236	Dec. 18-19, 2019 e-mail string Hanson-Gelser		
237	July 26, 2019 e-mail string Gelser-Hanson		
238	Jan. 9, 2019 e-mail string Gelser-Hanson		
239	Jan 10, 2023 Hanson-Hoeye e-mail		
240	Templates for work product		
241	Dec. 30, 2019 e-mail Hanson to Gelser		
242	Dec. 30, 2019 "Welcome back" e-mail Gelser to Hanson		
245	[G-B Exh 45] notes on Hanson work schedule		
250	2023 House Bill 2619		
251	ORS 192.005		
264	[Pham Exh 64] Ye memo re Hanson deficiencies		
265	[Canning Exh 65] memo re Hanson deficiencies		
267	[Pham Exh 67] Jan. 25, 2023 termination letter		
268	Hanson ADA request unfilled out		
269	[Hanson MSJ Dec. Exh. 9] Jan. 2, 2020 Hanson e-mail		
270	[Baumgart Dep. Exh. 21] Baumgart Investigative Report		

DATED April 18, 2024.

Respectfully submitted,

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s/ Marc Abrams

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